

PSJ3

Exhibit 680

4 IN RE: NATIONAL MDL No. 2804
5 PRESCRIPTION OPIATE
6 LITIGATION Case No.
1:17-MD-2804

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7 THIS DOCUMENT RELATES TO Hon. Dan A. Polster
8 ALL CASES

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

3 VIDEOTAPED DEPOSITION OF CRAIG SCHIAVO

5 Thursday, January 17th, 2019

8:06 a.m.

23 REPORTED BY:

24 Maureen O'Connor Pollard, RMR, CLR, CSR

1 A. In 2012, 2013, I don't recall.

2 BY MR. ELSNER:

3 Q. Is it done today?

4 MS. MILLER: Same objection, and
5 object to form.

6 A. I'm not familiar with the audit
7 process and everything that is audited.

8 BY MR. ELSNER:

9 Q. Okay. It says on Page 8 of the
10 PowerPoint under "DEA Reporting Requirements" at
11 the very top, it says "CVS is obligated to
12 report orders determined to be Suspicious that
13 were placed to our Distribution Centers," and
14 "placed to our distribution centers" is
15 underlined and in bold, correct?

16 A. I see that it is underlined, and it
17 appears that at least part of it is in bold.

18 Q. Okay. And then if you look down to
19 the third bolded item, it reads that "Orders
20 that are placed to an Outside Vendor that we
21 identify as an order deviating from the normal
22 size, frequency, and/or buying pattern and
23 deemed to not be for legitimate purposes or are
24 at the risk of being diverted are not required

1 to be reported to the DEA."

2 Did I read that correctly?

3 MS. MILLER: Object to form.

4 A. That's what it says, but I don't know
5 how we would identify an order placed to an
6 outside vendor deviating from normal size,
7 frequency, but I don't believe that part of our
8 process monitoring specific orders to the OV
9 when they are placed.

10 BY MR. ELSNER:

11 Q. So I guess my first question is, does
12 CVS have a system in place to monitor the orders
13 that are being placed by its pharmacies, whether
14 from the distribution center or to outside
15 vendors for controlled substances?

16 MS. MILLER: Object to form.

17 A. I know that CVS monitors orders of
18 controlled substances.

19 BY MR. ELSNER:

20 Q. From its pharmacies?

21 A. From its retail pharmacies.

22 Q. Okay. And it monitors them for
23 suspicious size, frequency, is that right?

24 MS. MILLER: Object to form.